

QUESTIONS & ANSWERS

Q1: Why does EASA not simply mandate accomplishment of a Service Bulletin (SB)?

A: The publication of an Airworthiness Directive (AD) intends to inform about an unsafe condition and to justify the required action(s) and compliance time(s). Comments are invited in response to a Proposed AD or final AD, and its content can be amended as a consequence. Where the AD deviates from the SB, the AD takes precedence. Through the proposed AD consultation process, owners and operators are usually given more time to prepare for the required action(s) and have the possibility to directly comment on the mandatory requirements.

Q2: Why does an AD correction not indicate that it supersedes the original issue?

A: In the EASA AD process, terms are used as follows (see [Continuing Airworthiness Procedure](#)):

- Correction: Small editorial changes have been made to the AD, its content hasn't changed.
- Revision: The original AD has been revised to relax the requirements, to reduce the group of affected products (applicability), to provide a new alternative method of compliance or to add other useful information. The original AD number is kept and suffixed "R1".
- Supersedure: New or more stringent requirements are introduced or the group of affected products (applicability) is expanded, the original AD is superseded. The new AD has a new number .

In all cases, the original AD is replaced by the corrected, revised or superseded AD.

Q3: Why does a revised AD not contain any new mandatory actions?

A: In the EASA AD system, an AD Revision is issued to relax the requirements, to reduce the group of affected products (applicability), to provide a new alternative method of compliance or to add other useful information. If any new or more stringent requirements are introduced, this will result in a superseding AD (= new AD with new AD number).

Q4: Why does the AD Applicability not state the Manufacturer Serial Number (MSN) as specified in the SB?

A: Many aircraft parts can be transferred from one aircraft to another. Some MSN may not be affected at the time of AD issuance (i.e. no corrective action required), but can become affected later on if a relevant part is installed. The AD regulates the installation (under certain conditions) of an affected part on other aircraft, or prohibits installation. If future installation of an affected part is impossible, the AD applicability can be limited to the affected MSN only.

Q5: Are "concurrent requirements" mentioned in the SB mandatory?

A: An SB is not mandatory by itself. An SB concerns the bilateral relation between the Design Approval Holder and the addressee(s) only. If the "concurrent requirements" are related to the unsafe condition, they will be mentioned in the AD. If they are not taken up in the AD, they are not mandatory.

Q6: Are reporting requirements in the SB mandatory?

A: An SB is not mandatory by itself. An SB concerns the bilateral relation between the design Approval Holder and the addressee(s) only. Even if such reporting requirements are often part of the SB, they are mandatory only if they are required by the AD.

Q7: What is meant by “Time Since New”?

A: This would relate to parts installed on an aircraft, but EASA prefers to use “since first installation on an aircraft” or “since first flight” for the aircraft.

Q8: Why are ADs involving parts not issued at parts and appliances level, but at product level?

A: EASA can issue ADs when the unsafe condition involves a Design Approval. The AD is addressed to the Design Approval Holder. Parts and appliances which do not have their own Design Approval must be addressed through an AD at product (aircraft, engine, propeller) level.

Q9: Why are parts and appliances affected by an AD not removed from the Illustrated Parts Catalogue (IPC) by the TC Holder?

A: Prompt update of the IPC is recommended by EASA, but managed by the TC Holder; the IPC is not a document approved by EASA. EASA uses SB information to write ADs and cannot cross-check part numbers with the IPC. The issue will be brought to the attention of the EASA DOA and Rulemaking teams. Please inform EASA of specific cases (e.g. by e-mail to ads@easa.europa.eu).

Q10: Does EASA have a list of Part Numbers (P/N) subject to an AD?

A: Currently EASA does not have such a list available.

Q11: Should the conditions for installation of a part or appliance be recorded in the AD report?

A: The conditions for part installation must be considered in a way which is acceptable to the authority of the State of Registry.

Q12: Why are TC Holder SBs and Vendor SBs not harmonised?

A: The technical content of SBs is usually approved by the TC Holder under DOA privilege and EASA does not have any legal tool to enforce harmonisation with a Vendor SB. EASA DOA Department has been made aware of the issue. Please inform EASA of specific cases (e.g. by e-mail to ads@easa.europa.eu).

Q13: When does EASA cancel an AD?

A: When the DAH can provide justification that the unsafe condition no longer exists, e.g. because all the affected parts have been removed from aircraft and are confirmed to have been taken out of circulation. In such a case, a Proposal for AD Cancellation would normally be published first to invite comments. Upon Cancellation, the AD (watermarked “CANCELLED”) remains in the AD Publishing Tool, an AD Cancellation Notice explains why the AD was cancelled and the requirements are deleted.

Q14: If EASA Member State (MS) NAA ADs are not binding, why do some NAAs reserve the right to deviate from EASA ADs?

A: EASA AD are directly binding to the Design Approval Holder. Owner, operators, maintenance organisations etc. are required by the Implementing Rules to comply. There is no need for additional action by the NAAs and they have no legal basis to issue ADs. However, under the flexibility provisions of Article 14.4 of Regulation (EC) no 216/2008, MS NAAs can grant an exemption from the AD requirements for a period of 2 months. If the exemption is granted for a period longer than 2 months or is repetitive, the affected MS shall notify EASA, the other MS and the Commission of such an exemption. Please inform EASA of any cases that do not meet these criteria (e.g. by e-mail to ads@easa.europa.eu). Note that Annex II aircraft and aircraft falling under Basic Regulation Art. 1(2) continue to be managed by the EASA MS NAAs.

Q15: Are Bilateral Agreements concluded between a third country and an EASA Member State prior to EASA still in effect?

A: The European Union (EU) has signed three agreements on civil aviation safety with the US, Canada and Brazil. To date, these agreements apply to certification of civil aeronautical products and maintenance. Upon entry into force, these Agreements shall supersede (in the case of the EU-CAN/BRA agreements) or take the necessary measures to terminate (in the case of the EU-US agreement) any bilateral safety agreement between the Member States (MS) of the EU and the above mentioned countries, with respect to any matters covered in the new agreements (namely certification & maintenance). In the absence of a Bilateral Agreement between the EU and a third country, relevant provisions of an EU MS Bilateral Agreement with a given third country might remain applicable, in accordance with the provisions of Article 12(2) of Regulation (EC) No 216/2012.

Q16: What is meant by “re-statement of actions” for which the compliance time has passed?

A: EASA has no visibility on operators' compliance with AD requirements. Therefore, when a superseding AD is issued, the requirements of the original AD sometimes need to be “re-stated”, e.g. to account for operators who have not yet complied with these requirements, but also to prevent that an aircraft is brought back to the pre-AD status.

Q17: Why are ADs issued for aircraft that have an extended Design Service Goal (DSG)?

A: EASA issues ADs for unsafe conditions identified on aircraft below or above the DSG. However, EASA ADs do not mandate an Extended Service Goal (ESG). The DSG is based on assumptions made at the time of certification, while justifications for an ESG are often based on data collected in service. Such analysis of in service-data may prove that certification assumptions were inaccurate and may result in different thresholds and intervals. Such changes in compliance times may have consequences for aircraft below the DSG if the same unsafe condition has been identified on those aircraft. If the unsafe condition exists on aircraft above the DSG only, then the AD only applies to aircraft which are operated beyond that limit.

Q18: Why does EASA publish some foreign ADs with a prefix (e.g. US-, BR-, RU-)?

A: This is a practical IT solution only and it is not meant to be read as a different or new AD number. Some foreign ADs follow the same AD numbering principle (YYYY-XX-XX), which can result in identical numbers for two ADs issued by two different Authorities. In past cases, the AD Publishing Tool mixed up the two records and file uploads were corrupted. The prefix was therefore introduced to clearly distinguish those ADs. The AD number as identified within the AD document itself applies and there is no requirement to record compliance using the AD number with the prefix.

Q19: If the FAA issues an AD prompted by an EASA AD, is the technical content identical?

A: For EU registered aircraft, the applicable AD is the one issued by EASA. An FAA AD issued as a consequence of an EASA AD is not necessarily identical in content. The FAA AD usually makes reference to the EASA AD (described as “Foreign MCAI”) which allows for comparison of the content. The FAA AD usually highlights the differences to the EASA AD, but this may not always be the case or easy to identify. In all cases, one notable difference would be a later effective date.

Q20: Why are FAA and EASA ADs for Airworthiness Limitations (ALS) not harmonized?

A: This is due to the fact that the FAA act as both State of Design (SoD) and State of Registry (SoR), where in Europe the responsibility is split between EASA (SoD) and the MS NAAs (SoR). EASA does not review and approve operator’s AMP documents, which is a SoR responsibility, as it is also the case outside Europe. Although regulation EC 2042/2003 (Part M) requires the operator’s AMP to demonstrate compliance with ICA (e.g. ALS), this regulation does not specify exactly when compliance with the latest revision (e.g. of the ALS) must be demonstrated. Cases were reported where NAAs required an operator to update their AMP with immediate effect, leading to (unnecessary) AOG. The EASA ALS AD therefore specifies an unambiguous compliance time of 12 months. During this 12 months period allowed for update of the AMP by the operator, plus review and approval of the AMP by the SoR NAA (i.e. compliance verification), aircraft safety is ensured since the actual on-aircraft (or on-engine, on-propeller, as applicable) tasks are already required by §(1) of the ‘standard’ EASA ALS AD.

Q21: What is the process for the adoption of Foreign ADs?

A: As per ED Decision [02/2003](#), ADs issued by the State of Design are adopted, unless EASA publishes a deviating decision before the effective date of the Foreign AD.

Q22: Why am I notified of all ADs and not just those in my filter?

A: When you register to the AD Publishing Tool and choose to receive notifications, two filters are created by default for all AD publications (“show all”) and all SIB notifications (“show SIB”), and notifications are activated for those default filters. In order to receive notifications for a personal filter only, deactivate the notification for the default filter and activate the notification for your personal filter. This is done in Tab “Advanced search” through button “Notify”. Filters for which notification is active are shown in orange, those inactive in black.

SUGGESTIONS

S1: Precise the existing AD FAQ to clarify that EASA State of Registry ADs are not mandatory in the EU regulatory system.

A: FAQ “What are the applicable ADs in EASA Member States” will be amended to reflect this information. Part 21.A.3B §(a) states that an Airworthiness Directive is a document ‘issued or adopted by the Agency’. EASA Member State NAAs should therefore no longer publish ADs, unless the AD is a (courtesy) translation of an AD issued or adopted by EASA. If an EASA Member State NAA AD exists which deviates from the corresponding EASA AD (or in case there is no corresponding EASA AD at all), it should be identified, reviewed and either cancelled by the respective NAA or published by EASA as a new ‘European’ AD.

S2: Consider the use of flowcharts in ADs.

A: Flowcharts may be useful to outline the required actions, but recording compliance times may be difficult. Flowcharts are often provided in the DAH service information for reference. EASA does not intend to change ADs to a flowchart system.

S3: Reduce the complexity of the “Required Action(s) and Compliance Time(s)” in an AD, especially for Revisions or Supersedures.

A: Our aim is to be as concise as possible, but the complexity of an AD usually results from the complexity of the related applicability and/or corrective actions. If you have ideas on how to simplify the text, please kindly comment on the Proposed AD.

S4: Automatic notifications from the AD Publishing Tool should have TCDS number(s) in the subject.

A: This is currently not possible as the AD Publishing Tool does not have a dedicated field for TCDS number(s). We intend to address this issue in the frame of the AD Tool upgrade project.

S5: For the next workshop, reserve more time for a Q&A session, preferably not at the end of the second day when people start to leave.

A: This request is noted and will be considered for the next workshop. If you have any topics for discussion at the next workshop, please send them to us at ads@easa.europa.eu.

S6: Make occurrence evaluation results accessible to operators.

A: The content of the European Central Repository for Aviation Accident and Incident Reports (ECR/ECCAIRS) is restricted to entities entrusted with regulating civil aviation safety and to investigation bodies in the EU. Any interested party defined in the Regulation can request access to information (aggregated or anonymised) from the ECR. Some necessary requirements are to be met as detailed in articles 10 and 11 of Regulation [376/2014](#) as well as in Annexes II and III. These interested parties can have more detailed information on occurrences related to their own equipment (product), operations or field of activity.